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BEST & FLANAGAN, LLP and
DANIEL L. GRIMSRUD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PACKLANE, INC.,) Case No.: 23-cv-03496-HSG
vs.)
Plaintiff,) Assigned to Hon. Haywood S. Gilliam, Jr.
vs.) for all proceedings
BEST & FLANAGAN, LLP and DANIEL L.)
GRIMSRUD,)
Defendants.)
)
STIPULATION OF THE PARTIES TO
CONTINUE ADR DEADLINE AND
ORDER MODIFYING DOCUMENT
NUMBER 36

Plaintiff PACKLANE, INC. and Defendants BEST & FLANAGAN, LLP and DANIEL L. GRIMSRUD, by and through counsel, hereby stipulate to the following:

- 20 1. By Order dated December 20, 2023, the Court set an ADR deadline for the parties to
21 complete mediation by May 21, 2024, i.e. within 150 days of the date of the Order. *See*
22 Doc. No. 36;
23 2. The parties have been engaged in written discovery and document productions. To date,
24 they have produced approximately 23,000 pages of documents. Due to the complexity of
25 issues and the large number of documents, however, the parties have not yet completed
26 the first round of discovery. They anticipate completing the first round of discovery by
27 mid-April, 2024;
28 3. The parties set a mediation date with mediator Stan Roman for May 8, 2024;

- 1 4. Due to the unanticipated delay in completing the initial round of discovery, the parties do
2 not believe there will be sufficient time between the completion of the first round of
3 discovery and the ADR deadline to make mediation fruitful; and
4 5. Therefore, the parties jointly request that the Court continue the ADR deadline to June
5 28, 2024 in order to allow the parties time to properly prepare for mediation by
6 evaluating the claims in light of the evidence produced in response to the outstanding
7 discovery so that mediation may be fruitful.

8 Dated: 4-10-2024

9 GORDON REES SCULLY MANSUKHANI, LLP

10 By: 
11 Dion N. Cominos

12 Terrence J. Brasch
13 Attorneys for Defendants
14 BEST & FLANAGAN, LLP and
15 DANIEL L. GRIMSRUD

16 Dated: 4/10/2024

17 KAGEN, CASPERSEN & BOGART, PLLC

18 By:  
19 Stuart Kagen
20 Joshua Gillette
21 Attorneys for Plaintiff
22 PACKLANE, INC.

23 **ORDER**

24 Pursuant to the stipulation of the parties, and for good cause shown, so that the parties
25 may properly prepare for mediation in order to make mediation fruitful, the Court hereby orders
26 that the ADR deadline is continued to June 28, 2024. Document No. 36 is hereby amended to
27 reflect this continued ADR deadline date.

28 IT IS SO ORDERED.

Dated: 4/11/2024


Hon. Haywood S. Gilliam, Jr.